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March 24, 2022

VIA E-FILING

Hon. Therese Wiley Dancks
United States District Court
Northern District of New York
100 S. Clinton Street
Syracuse, NY 13261

RE: Manes, Administrator of Estate of Rivas v. Onondaga County, et al
Civil Action No.: 5:19-cv-844

Dear Judge Dancks:

I am advising the Court that the Plaintiff's object to and will not provide in response to our demand the following documents from Mr. Riva's various files as maintained by his attorneys including:

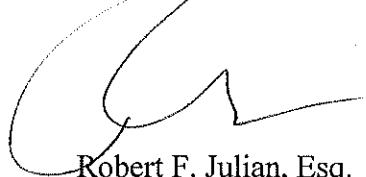
- Documents that support the conspiracy between Fitzgerald and Mitchell;
- Documents that support the allegations that Mitchell was under investigations when he testified in the Rivas Trial;
- Documents that support the allegation that Fitzgerald was investigating Mitchell at the time Mitchell testified;
- All written or recorded statements from witnesses that have formed the basis of the allegations in the Complaint;
- The trial notes of Richard Calli (the lawyer who tried the Riva's case);
- All witness interview notes regarding all of the proceedings in the Rivas case;
- All notes and records of interviews with Rivas;
- Copies of all whistleblower complaints of Sawyer and Ridle as referenced in paragraphs 50-58 of the Complaint;

The Plaintiffs have declined to produce this information.

Office Hours by Appointment only

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Respectfully,



Robert F. Julian, Esq.
RFJ/jan

cc: Scott Korenbaum, Esq.
Joshua S. Moskovitz, Esq.
Danielle Pires, Esq.
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